

JERROLD ABELES (SBN 138464)
DAVID G. BAYLES (SBN 208112)

ARENT FOX LLP

555 West Fifth Street, 48th Floor
Los Angeles, CA 90013-1065
Telephone: 213.629.7400
Facsimile: 213.629.7401

Attorneys for Plaintiff
ALL POINTS CAPITAL CORP., a New York
corporation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ALL POINTS CAPITAL CORP., a New
York corporation,

Plaintiff,

v.

ARCHITECTURAL METAL PRODUCTS,
INC., an Alaska corporation; PACIFIC
ROLLFORMING, LLC, an Alaska limited
liability company; RIDGETOP HAWAII,
INC., an Hawaiian corporation; RIDGETOP
ROOFING AND GUTTER, INC., an Alaska
corporation; ROBERT OLLMAN, a citizen
of the State of Wisconsin; BORIS
GOKHMAN, a citizen of the State of
Wisconsin; VLADIMIR SHUK, a citizen of
the State of Wisconsin; and TODD
BEASLEY, a citizen of the State of Alaska,

Defendants.

Case No. C 08-04394 VRW

**STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE THE CASE
MANAGEMENT CONFERENCE**

CURRENT Case Management Conference:

Date: January 8, 2009
Time: 3:30 P.M.
Place: Courtroom 6
17th Floor
United States District Courthouse
450 Golden Gate Ave.
San Francisco, California

PROPOSED Case Management Conference:

Date: ~~March 12, 2009~~ March 19, 2009

1 WHEREAS Plaintiff All Points Capital Corp., a New York corporation ("Plaintiff"), is
2 represented by Arent Fox LLP, by attorneys in the New York and Los Angeles offices of the
3 firm;

4 WHEREAS Defendants Architectural Metal Products, Inc., an Alaska corporation, Pacific
5 Rollforming, LLC, an Alaska limited liability company, Ridgetop Hawaii, Inc., an Hawaiian
6 corporation, Ridgetop Roofing and Gutter, Inc., an Alaska corporation, and Todd Beasley, a
7 citizen of the State of Alaska (sometimes collectively referred to herein as the "Beasley
8 Defendants") are represented by Frederick Phillips, an attorney whose office is in San Diego,
9 California,

11 WHEREAS Defendant Boris Gokhman, a citizen of the State of Wisconsin is appearing
12 *Pro Se* in this action ("Defendant Gokham"),

14 WHEREAS Defendant Vladimir Shuk, a citizen of the State of Wisconsin is also
15 appearing *Pro Se.* in this action ("Defendant Shuk"); and

16 WHEREAS the parties are attempting to negotiate a stipulated judgment, all of the parties
17 have expressed a willingness to resolve this dispute by a stipulated judgment, and the parties
18 desire additional time for their negotiations to proceed without the added expense of traveling to
19 San Francisco for the joint case management conference currently set for January 8, 2009;

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2 NOW THEREFORE, the parties stipulate and agree that, subject to the approval of the
3 Court, the case management conference shall be continued for approximately sixty days until
4 March 12, 2009, at 3:30 p.m. in Courtroom 6 of the above-entitled Court, or until such other date
5 and time as may be convenient for the Court.

6 Dated: December 29, 2008

Arent Fox LLP

7 By: /s/

8 DAVID G. BAYLES
9 Attorneys for Plaintiff
ALL POINTS CAPITAL CORP.

10 Dated: December 29, 2008

11 By: /s/

12 FREDERICK PHILLIPS, on behalf of
13 Architectural Metal Products,
14 Rollforming, LLC, Ridgetop Hawaii, Inc.,
Ridgetop Roofing and Gutter, Inc., and
Todd Beasley

15 Dated: December 29, 2008

16 By: /s/

BORIS GOKHMAN, *Pro Se*

17 Dated: December 29, 2008

18 By: /s/

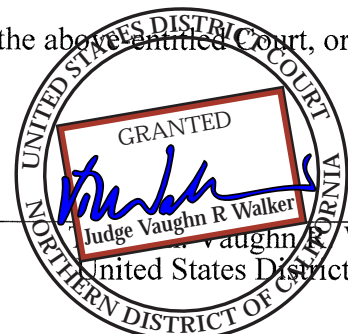
VLADIMIR SHUK, *Pro Se*

19 ~~PROPOSED~~ ORDER

20 Pursuant to the stipulation of the parties set forth above and GOOD CAUSE appearing
21 therefore, the case management conference in the above-referenced action currently set for
22 January 8, 2009, is hereby continued until March 19, 2009, at 3:30 p.m. or
23 _____ in Courtroom 6 of the above-entitled Court, or.
24

25 IT IS SO ORDERED.

26 Dated 12/30/2008



1 **ALL POINTS CAPITAL v. ARCHITECTURAL METAL PRODUCTS**
2 **CASE NO.: C 08-04394 VRW**
3 **USDC, NORTHERN DISTRICT, SAN FRANCISCO**
4 **PROOF OF SERVICE**

5 I am a citizen of the United States. My business address is ARENT FOX LLP, 555 West
6 Fifth Street, 48th Floor, Los Angeles, CA 90013. I am employed in the county of Los Angeles
7 where this service occurs. I am over the age of 18 years, and not a party to the within cause.

8 On December 29, 2008 I electronically filed the following document(s) with the Clerk of the
9 Court using the CM/ECF system, which sent electronic notification of such filing to all parties
10 appearing on the docket sheet:

11 **Stipulation and [Proposed] Order to Continue The Case Management Conference**

12 (BY FAX) by transmitting via facsimile from facsimile number (213) 629-7401 the
13 document(s) listed above to the fax number(s) set forth below, or as stated on the
14 attached service list, on this date before 5:00 p.m. A statement that this document was
15 successfully transmitted without error is hereby attached to this Proof of Service.

16 **X (BY MAIL)** I am readily familiar with my employer's business practice for collection
17 and processing of correspondence for mailing with the U.S. Postal Service, and that
18 practice is that correspondence is deposited with the U.S. Postal Service the same day as
19 the day of collection in the ordinary course of business. On this date, I placed the
20 document(s) in envelopes addressed to the person(s) listed below, or as stated on the
21 attached service list and sealed and placed the envelopes for collection and mailing
22 following ordinary business practices.

23 (BY PERSONAL SERVICE) On this date, I delivered by hand envelope(s) containing
24 the document(s) to the persons(s) listed below or as stated in the attached service list.

25 (BY OVERNIGHT DELIVERY) On this date, I placed the documents in envelope(s)
26 addressed to the person(s) listed below or as stated on the attached service list, and
27 caused those envelopes to be delivered to an overnight delivery carrier, with delivery
28 fees provided for, for next-business-day delivery to whom it is to be served.

X (BY ECF) I caused said documents to be transmitted using the Court's
ECF system.

SEE ATTACHED SERVICE LIST

X (Federal) I declare that I am employed in the office of a member of the bar
of this court at whose direction the service was made. I declare under the
penalty of perjury under the laws of the United States of America that the
above is true and correct.

Executed on December 29, 2008, at Los Angeles, California


Barbara Anderson

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Frederick C. Phillips, Esq. Phillips, Haskett & Ingwalson 701 "B" Street, Suite 1190 San Diego, CA 92101 Tel.: (619) 231-3737 Fax: (619) 233-1223 Via ECF	Vladimir Shuk in Pro Per New Land 1840 North Farwell Avenue, #203 Milwaukee, WI 53202 Via U. S. Mail Boris Gokhman in Pro Per New Land 1840 North Farwell Avenue, #203 Milwaukee, WI 53202 Via U.S. Mail
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